REMARKS

This Amendment is submitted in response to the Office Action mailed on September 14, 1999. Claims 1, 2, and 4 - 17 are pending, and all stand rejected, except claim 17, which would be allowable if re-written. That has been done. Claims 14 - 16 have been combined with claim 17.

Claims 18 and 19 are added.

Support for the amendment to claims 1 and 6 is found in the Specification, page 4, lines 1 - 5.

Support for the amendment to claim 14 is found at the bottom of page 3, top of page 4. (The first request made to the user is for a PIN. No other requests for identification have been made.)

Support for added claims 18 and 19 is found on page 4, lines 7 - 8.

Response to 102-Rejections

Suzuki shows a "smart card." (Column 1, lines 11 - 15.) It contains memory which contains various data identifying a person: birthday, telephone number, etc. (Figure 2, components 26a - 26f.)

In Suzuki, if a person forgets a PIN (Personal Identification Number), the person is allowed to prove identity by keying-in other numbers, such as telephone number and birthday. (Column 4, lines 28 - 47.)

Amended claim 1 does not recite that. It states that a message is issued asking for a **subset** of another stored field, such as the third and first digits, in that order, of a stored telephone number. (See Specification, page 4, lines 2 - 5.) Claim 1 also

states that the **subset** entered is compared with a corresponding subset stored in memory.

Suzuki does not show that. MPEP § 2131 states:

> A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.

Therefore, claim 1 recites

-- a message requesting a **subset** of data, and

-- comparison of that **subset** with a corresponding subset.

Suzuki shows neither of these recitations.

This response applies to amended claim 6.

Amended claim 14 states that the step of paragraph (c) occurs prior to any other request for identity data. Thus, the comparison of paragraph (d) must occur using the "first data," which is supplied prior to any other data.

Suzuki does not show that. Suzuki first asks for a PIN. If his customer punches in a correct PIN, that ends his validation procedure. (See decision block 52 in his Figure 3. See column 3, lines 16 - 24.)

But claim 14 states that, if the first data agrees with the stored data, nevertheless, second data is requested for comparison. Suzuki does not show that. In Suzuki, if the PIN is correct, the customer is validated, and no further validation is undertaken.

Therefore, Applicant submits that the recitations of the independent claims are not shown in Suzuki.

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Response to Obviousness Rejections

Claim 11

Granzow is combined with Suzuki, to show claim 11, which depends from claim 1. However, as explained above, Suzuki does not show amended parent claim 1. MPEP 2143.03 states:

> To establish prima facie obviousness . . . **all the claim limitations** must be taught or suggested by the prior art.

Claim 16

In response to the reliance on "well known" art, Applicant traverses this assertion, and requests that a reference be cited in support of the assertion. (See MPEP § 2144.03.)

One reason is that the cited "well known" art is contrary to Suzuki's teachings. Suzuki, in effect, says, "Give the customer another chance if he forgets the PIN." Suzuki allows the customer to compensate for lack of a PIN by providing two other numbers.

Thus, the Office Action asserts that "it is well known . . . that if these data are not in agreement that the transaction is suspended." However, as just shown, Suzuki teaches to the contrary. He fails to suspend, if a proper PIN is not entered.

Dependent Claims

The preceding discussion applies to the dependent claims.

Claims 18 and 19

The Specification, page 4, lines 1 - 17, indicate that the "subset" data requested can be different, at different times. For example, at one time, the day of birth may be requested. At another time, the month of birth may be requested.
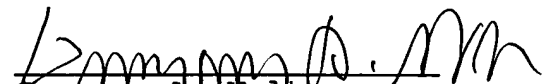
The applied references do not appear to show that.

Conclusion

Applicant submits that all independent claims are allowable, and that all dependent claims are allowable because of their parents.

Applicant requests that the rejections to the claims be reconsidered and withdrawn.

Applicant expresses thanks to the Examiner for the careful consideration given to this case.

Respectfully submitted,

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